

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

MARK MANCINI,  
PLAINTIFF

v.

C.A. No. 13-092-S-PAS

CITY OF PROVIDENCE, by and Through Its  
Treasurer, James J. Lombardi, III, and  
HUGH CLEMENTS, JR.,  
DEFENDANTS.

AFFIDAVIT OF MARK MANCINI

I, MARK MANCINI, hereby attest to the following facts:

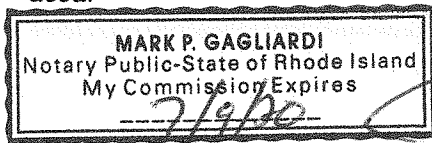
1. I am over eighteen years old.
2. I have only received formal discipline twice in my career and both times occurred when I was a Patrolman.
3. In 2004, I took a Sergeants Promotional Exam, and I was promoted to the position of Sergeant.
4. I have not been disciplined since I have been a Sergeant.
5. On November 15, 2010, I injured my right knee in the line of duty chasing a suspect.
6. My doctor, Michael D. Feldman, diagnosed me with *chondromalacia* of the right knee.
7. My workplace injury required me to undergo extensive physical therapy.
8. On February 3, 2011, I had surgery on my right knee.
9. As a result of my workplace injury, my employer placed me on IOD Status.
10. Eventually, my workplace injury improved, and I returned to work on light duty status in May 2011.
11. At the time I sat for the June 2012 Lieutenants Exam, my workplace injury substantially limited my ability to stand, walk, bend, lift, and work.
12. At the time I sat for the June 2012 Lieutenants Exam, my physical impairment substantially limited my ability to stand, walk, bend, lift, and work as compared to the average member in society.
13. If I did not undergo mitigating measures such as taking anti-inflammatory medication and pain medication, my physical impairment would have substantially limited my ability to stand, walk, bend, lift, and work as compared to the average member in society.
14. My employer forced me against my wishes to submit an application for retirement on accidental disability benefits.
15. When my application for retirement on accidental disability benefits was denied, my employer refused to put me back to work on light duty status.

Signed and sworn this 27th day of June 2016.

Mark Mancini  
MARK MANCINI

STATE OF RHODE ISLAND  
COUNTY OF PROVIDENCE

On the 27th day of June 2016, before me personally appeared LAURA FONTAINE, to me known and known by me to be the person executing the foregoing instrument, and she acknowledged said instrument, by her so executed, to be her free act and deed.



Notary Public  
My commission expires: 7/9/20

Mark P. Gagliardi